



IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

UNITED STATES OF AMERICA

PLAINTIFF

v.

CIVIL CASE NO. 3:16-cv-27 awr-FKB

REAL PROPERTY LOCATED AT
19 CRANE PARK, HATTIESBURG,
LAMAR COUNTY, MISSISSIPPI
WITH ALL APPURTENANCES,
IMPROVEMENTS, AND FIXTURES
THEREON, ET AL.

DEFENDANT
PROPERTY

COMPLAINT

The United States of America, the Plaintiff herein, by and through its United States Attorney, brings this Verified Complaint for Forfeiture *In Rem* and alleges as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

NATURE OF THE ACTION

This is a Verified Complaint for Forfeiture *In Rem* brought pursuant to 18 U.S.C. § 981(a)(1) for seizure and forfeiture of the property (the "Defendant Property") listed on the attached exhibits.

THE DEFENDANT IN REM

The approximate value of the Defendant Property at this time is believed to be at least Eleven Million Dollars (\$11,000,000.00), although there may have been subsequent deposits/withdrawals since the most recent statements provided to the United States.

JURISDICTION AND VENUE

The United States of America brings this action *in rem* in its own right to forfeit and condemn the Defendant Property. This Court has subject matter jurisdiction over an action

commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture pursuant to 28 U.S.C. § 1355(a).

This Court has *in rem* jurisdiction over the Defendant Property pursuant to 28 U.S.C. § 1355(b)(1)(B), incorporating 28 U.S.C. § 1395. Upon the filing of this Complaint, the United States requests that the Clerk of Court issue an arrest warrant in rem pursuant to Supplemental Rule G(3)(b)(I), which the United States will execute upon the property pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

Venue is proper in this district pursuant to 28 U.S.C. §§ 1355 and 1395, and pursuant to 18 U.S.C. § 981(h) because the acts or omissions giving rise to the forfeiture occurred in this district, and pursuant to 28 U.S.C. § 1395 because the Defendant Property is located in this district.

BASIS FOR FORFEITURE

The Defendant Property is subject to forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A) & (C) and 982(a)(1) & (7) because it constitutes property involved in, or is traceable to property involved in, a violation of 18 U.S.C. §§ 1956 and 1347.

FACTS AND CIRCUMSTANCES

The Declaration of Agent Darren Mayer of the Internal Revenue Service, attached hereto as Exhibit "A" and incorporated herein by reference, sets forth in more detail the facts and circumstances supporting the seizure and forfeiture of the Defendant Property.

CLAIM FOR RELIEF

WHEREFORE, the United States prays that the Defendant Property be forfeited to the United States, that due process issue for seizure and forfeiture of the Defendant Property, that this Court issue a warrant for the arrest of the Defendant Property, that all persons having an interest therein be cited to appear herein and show cause why forfeiture should not be decreed, that notice

of this action be given to all persons known or thought to have an interest in or right against the property, that a judgment be entered declaring that the Defendant Property be condemned as forfeited to the United States for disposition in accordance with law, that the United States be awarded its costs and disbursements in this action, and for such other and further relief as the Court deems just and proper.

Dated this the 20th day of January, 2016.

Respectfully Submitted,

UNITED STATES OF AMERICA
GREGORY K. DAVIS
United States Attorney

By: 

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VERIFICATION

STATE OF MISSISSIPPI
COUNTY OF HINDS

I, Darren Mayer, who after being duly sworn, state that I make this verification for and on behalf of the plaintiff, United States of America; that I have read the foregoing Complaint and know the contents thereof; that my information and knowledge about its contents is supplied to me by my investigation; and the matters and things set forth in the Complaint are true to the best of my knowledge, information and belief.

WITNESS my signature this 15 day of January, 2016.



DARREN M. MAYER, SPECIAL AGENT
Internal Revenue Service